Unofficial Survey Form
Project 2010-14.2.2 Phase 2 of Balancing Authority Reliability-based Controls: Time Error Correction

DO NOT use this form for submitting survey responses. Use the electronic form to submit survey responses for Project 2010-14.2.2 Phase 2 of Balancing Authority Reliability-based Controls: Time Error Correction. Responses must be submitted by 8 p.m. Eastern, Tuesday, August 25, 2015.

Documents and information about this project are available on the project page. If you have questions, contact Senior Standards Developer, Darrel Richardson (via email), or at (609) 613-1848.

Background Information
This Project 2010-14.2.2 Phase 2 Balancing Authority Reliability-based Controls standard drafting team (BARC 2.2 SDT) is soliciting comments from the industry concerning the disposition of BAL-004-0. During the SAR comment phase the industry indicated support for the retirement of BAL-004-0, however it was unclear whether industry supported maintaining or eliminating manual Time Error Correction (the ability to operate with a frequency offset).

The Federal Energy Regulatory Commission ("Commission" or "FERC") has determined that manual Time Error Correction is a reliability issue, as a Reliability Standard is necessary to ensure that Time Error Corrections are performed in a manner that does not adversely affect reliability. Thus, while Time Error Corrections may not be necessary to ensure reliability, if Time Error Corrections are performed, FERC has clarified that there must be a Reliability Standard in place ensuring performance in a way that does not adversely affect reliability.

In Order No. 693, at P 383 the Commission stated:

“Many commenters aver that the time error correction procedure belongs within the realm of NAESB and is not a reliability issue. The Commission disagrees, as BAL-004-0 is intended to ensure that time error corrections are performed in a manner that does not adversely affect the reliability of the Interconnection. The financial aspects of time error correction such as MISO’s concern about the unilateral payback of interchange imbalances remain with NAESB. However, the technical details, including the means to carry out the procedure, are a reliability issue.”

*Mandatory Reliability Standards for the Bulk-Power System, Order No. 693, 118 FERC ¶ 61,218, P 383 (2007)*

Later, the Commission highlighted in a Notice of Proposed Rulemaking ("NOPR") on, now withdrawn, BAL-004-1:
“In Order No. 693, we disagreed with arguments that Time Error Correction is really more a NAESB business practice. Rather, we stated that the Time Error Correction Reliability Standard is intended to ensure that Time Error Corrections are performed in a manner that does not adversely affect reliability, and the technical details, including the means to carry out the procedure, are a reliability issue.

NERC has stated that in its view Time Error itself is not a reliability risk, and the purpose of the Time Error Correction Reliability Standard is not to account for Time Error, but to ensure Time Error Corrections are implemented in a reliable manner. Any time the Balancing Authorities within an Interconnection undertake an actual modification to their generation dispatch to correct for Time Error, it must be coordinated and monitored by a Reliability Coordinator to ensure that each Balancing Authority schedules the same frequency and preclude negative impacts on reliable operation, allowing the Reliability Coordinator to maintain a wide area view of other activities, planned or unplanned, occurring on the system at the time....”


**Questions**

1. Based on comments related to the SAR, the industry supports the retirement of BAL-004-0, however it is unclear whether industry supports maintaining or eliminating manual Time Error Correction (the ability to operate with a frequency offset). Based on the SDT’s interpretation of FERC Order No. 693 and the NOPR in RM09-13-000, FERC has clearly stated that implementation of a manual TEC would require a standard to be in place. The SDT has posted proposed requirement concepts that they believe address the reliability issues for implementation of a manual TEC. Based on these concepts, do you support (i) maintaining the ability to implement a TEC or (ii) do you prefer eliminating the standard and the ability to implement a manual TEC?

   Maintain the ability to implement manual TEC with requirements similar to those proposed.
   X Eliminate the ability to implement manual TEC and standard BAL-004-0 Time Error Correction.

   Comments: We support the elimination of BAL-004 and its requirement to perform time error correction since time error correction is not necessary to maintain reliability. This should no longer be a standard, and if determined to be needed, should be made a NAESB business practice.

2. If the industry elects to maintain the ability to implement manual TEC, do you agree that the proposed requirements address the reliability issues surrounding implementing manual Time Error Correction?
3. If the industry elects to maintain the ability to implement manual TEC, the SDT recommends that these requirements be included in an IRO standard. Do you agree?

   Yes: X
   No:
   Comments:

4. If you have any other comments or reliability concerns please provide them in the space below.
   Comments: